<div style="text-align:center">**REMARKS/ARGUMENTS**</div>

The non-final office action of February 1, 2007 has been carefully reviewed and these remarks are responsive thereto. Reconsideration and allowance of the instant application are respectfully requested. Claims 7-12 and 19-30 remain in this application. No new matter has been added.

Preliminarily, Applicants note that the office action at page 1 has indicates that it was generated responsive to communication(s) filed on September 11, 2006. Applicants believe that this was merely a clerical oversight in the composition of the office action, and that the intended date was October 11, 2006. Given the state of the office action, wherein it appears that the amendments contained in the October 11, 2006 communication have been incorporated, this paper presumes Applicants' remarks from the October 11, 2006 communication have been fully considered.

Interview Summary

Applicants' representatives would like to express their appreciation for the time taken by Examiner Al-Hashemi and Examiner Daye to discuss the pending claims in a personal interview on March 13, 2007. The following remarks include Applicants' substance of interview pursuant to MPEP § 713.04. As per the Interview Summary, Applicants' representatives presented claim amendments relating to determining when a change to a second data structure creates a mandatory collision. Accordingly, Applicants have amended the independent claims herein so as to incorporate the discussed features.

Rejections Under 35 U.S.C. § 103

Claims 7, 9, 19, 21, 25, and 27 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. published application no. 20020133507 to Holenstein et al. ("Holenstein") in view of US patent 5588147 to Neeman et al. ("Neeman"). Claims 8, 20, and 26 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Holenstein in view of Neeman, and further in view of U.S. published application no. 20020191452 to Fujihara ("Fujihara"). Claims 10-12, 22-24, and 28-30 stand rejected under 35 U.S.C. § 103(a) as being

unpatentable over Holenstein in view of Neeman, and further in view of Brush, Gupta, Bargeron and Cadiz, "Robust Annotation Positioning in Digital Documents," published 9/22/2000, Microsoft Corporation, Technical Report (referred to hereinafter as "Gupta" to be consistent with the office action). Applicants respectfully traverse these rejections.

Amended independent claim 7 recites features related to "when the corresponding node in the first data structure is accessible, determining, that the change to the second data structure creates a mandatory collision." The office action at pages 3-4 correctly indicates that Holenstein is silent with respect to the recited features. As noted during the interview, Neeman fails to teach or suggest the recited features as they relate to mandatory collisions. The office has conceded in the present (February 1, 2007) office action at pages 3-4 that Holenstein fails to teach or suggest the features recited herein as they relate to mandatory collisions. Applicants submit that Neeman fails to teach or suggest the claimed features that relate to mandatory collisions. Thus, even if the combination of Holenstein and Neeman was proper, the combination would not have resulted in the aforementioned features as they relate to mandatory collisions as recited in claim 7. Claim 7 is allowable for at least this reason.

Amended independent claims 19 and 25 recite features similar to those described above with respect to claim 7. Thus, independent claims 19 and 25 are allowable for at least those same reasons.

Claims 9, 21, and 27, which each depend from one of claims 7, 19, and 25, are patentably distinct over the combination of Holenstein and Neeman for the same reasons set forth above, and further in view of the additional advantageous features recited therein.

Claims 8, 20, and 26, which each depend from one of claims 7, 19, and 25, are patentably distinct over the combination of Holenstein and Neeman for the reasons set forth above. Moreover, the addition of Fujihara fails to cure the above noted deficiencies of Holenstein and Neeman. Thus, even if any combination of the applied references was proper, the resultant combination would not have resulted in the invention of claims 8, 20, and 26. Thus, claims 8, 20, and 26 are allowable for at least these reasons, and further in view of the additional advantageous features recited therein.

Claims 10-12, 22-24, and 28-30, which each depend from one of claims 7, 19, and 25, are patentably distinct over the combination of Holenstein and Neeman for the reasons set forth above. Moreover, the addition of Gupta fails to cure the above noted deficiencies of Holenstein and Neeman. Thus, even if any combination of the applied references was proper, the resultant combination would not have resulted in the invention of claims 10-12, 22-24, and 28-30. Thus, claims 10-12, 22-24, and 28-30 are allowable for at least these reasons, and further in view of the additional advantageous features recited therein.

For example, dependent claim 10 calls for, among other features, the following as it pertains to discretionary collision criteria: prohibits ink strokes from being added to a leaf node below a pinned node, prohibits ink strokes from being removed from a leaf node below the pinned node, prohibits adding leaf nodes below the pinned node, prohibits removing leaf nodes below the pinned node, and prohibits re-parenting of leaf nodes below the pinned node. To show the features of prohibits ink strokes from being added, prohibits ink strokes from being removed, prohibits adding (leaf nodes), and prohibits removing (leaf nodes), as it pertains to leaf nodes below a pinned node, the action relies on Gupta pg.7, paragraph [5.3.1], lines 5-8 and Gupta pg.4, paragraph [3.2], line 12. The action, in Footnote 7 Examiner Notes, analogizes the anchor text in Gupta to the pinned node of the instant invention on the basis that the anchored text is "unchangeable". Gupta describes on pg. 4, paragraph [3.2.2], using surrounding context in the event that the anchor text information does change. As such, anchor text does not have all of the same properties as pinned nodes; or more specifically, anchor text does not have the limitation of being unchangeable. With respect to the feature of prohibits re-parenting of leaf nodes below the pinned node in the instant application, the action attempts to show this feature citing to Gupta pg.6, paragraph [5.1.1], lines 11-14. Gupta paragraph [5.1.1], lines 11-14 describes if the algorithm could not find a location for the annotation, it orphaned the annotation. Applicants respectfully disagree that "orphaned" is a substitute term for "prohibits re-parenting" in this context, as stated in the action, Footnote 8 Examiner Notes. The status change of an annotation (i.e. node) in Gupta from parented to orphaned represents a parental status change, and hence, does not teach or suggest "prohibits re-parenting". Claim 10 is allowable for at least these additional reasons.

Dependent claims 11 and 12 call for, among other features, the following as it pertains to discretionary collision criteria: allows ink strokes to be added to a leaf node below a pinned node under specified conditions and prohibits ink strokes from being removed from a leaf node below the pinned node. Dependent claim 11 furthermore calls for, as it pertains to discretionary collision criteria: prohibits adding leaf nodes below the pinned node, prohibits removing leaf nodes below the pinned node, and prohibits re-parenting of leaf nodes below the pinned node.

With respect to the feature of allows ink strokes to be added to a leaf node below a pinned node under specified conditions, the action relies on Gupta pg. 7, paragraph [5.3.3], lines 1-3 and 9-14 to show this. Applicants respectfully disagree with this assertion; Gupta demonstrates modifications to the anchor text. This is unrelated to the notion of the parental relationship established between a leaf node and a pinned node in the instant application, and does not teach nor suggest allows ink strokes to be added to a leaf node below a pinned node under specified conditions.

With respect to the features of prohibits ink strokes from being removed from a leaf node below the pinned node, prohibits adding leaf nodes below the pinned node, and prohibits removing leaf nodes below the pinned node, the action relies on Gupta pg. 7, paragraph [5.3.1], lines 5-8 and Gupta pg.4, paragraph [3.2], line 12 to show this. Gupta paragraph [5.3.1] does not in any way prohibit an activity (e.g. addition, removal) as in the instant application; paragraph [5.3.1] demonstrates one example where the anchor text does not change, but that does not mean that it is "prohibited" from changing as in the instant invention. Gupta paragraph [3.2], line 12 uses anchor text as a means to identify an annotation's location. The action, in Footnote 7 Examiner Notes, analogizes the anchor text to the pinned node of the instant claims on the basis that the anchored text is "unchangeable". Applicants respectfully disagree with this assertion. Gupta demonstrates on pg. 4, paragraph [3.2.2], using surrounding context in the event that the anchor text information does change. As such, anchor text does not have all of the same properties as pinned nodes; or more specifically, anchor text does not have the limitation of being unchangeable. Claims 11 and 12 are allowable for at least these additional reasons.

With respect to the feature of prohibits re-parenting of leaf nodes below the pinned node, the action relies on Gupta pg. 6, paragraph [5.1.1], lines 11-14 to show this. Gupta paragraph

[5.1.1], lines 11-14 demonstrates if the algorithm could not find a location for the annotation, it orphaned the annotation. Applicants respectfully disagree that "orphaned" is a substitute term for "prohibits re-parenting" in this context, as stated in the action, Footnote 8 Examiner Notes. The status change of an annotation in Gupta from parented to orphaned represents a parental status change, and hence, does not teach nor suggest "prohibits re-parenting". Claim 11 is allowable for at least this additional reason.

<div align="center">CONCLUSION</div>

It is believed that no fee is required for this submission. If any fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

All rejections having been addressed, applicants respectfully submit that the instant application is in condition for allowance, and respectfully solicit prompt notification of the same.

Respectfully submitted,

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